

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 04-30034-MAP
)
 MICHAEL CROOKER,)
 Defendant.)

Government's Motion to Extend Time

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court permit the government to file its memorandum in opposition to Mr. Crooker's Rule 29(c) motion by 4:30pm today, October 17, 2006.

The attorney for the government responsible for responding to Mr. Crooker's motion has been preparing for and assisting in prosecuting the ongoing jury trial of United States v. Davis, Cr. 04-30033-MAP. Jury selection in the Davis case took place on September 11, 2006, and the substantive portion of the trial is now in its fifth week. The government was unable to file its response to Mr. Crooker's motion yesterday because of the work needed to respond to Mr. Davis's extensive Rule 29 motion. As a result, the government respectfully requests that it be permitted to file its opposition by 4:30pm today.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: October 17, 2006

Certificate of Service

October 17, 2006

I certify that I caused the foregoing document to be served via ECF and fax on counsel for the defendant, Vincent Bongiorno, Esq, 95 State Street, Springfield, MA 01103.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney